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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ERICA FRASCO, individually and on behalf of  
 all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
 FACEBOOK, INC., APPSFLYER, INC., and  
 FLURRY, INC.,

Defendants.

Case No.: 3:21-cv-00757-JD

**DECLARATION OF  
 CAROL C. VILLEGAS**

Judge: Hon. James Donato  
 Hearing: February 10, 2022  
 Time: 10:00 a.m.  
 Place: Courtroom 11, 19th Floor  
 450 Golden Gate Ave  
 San Francisco, CA 94102  
 Date Filed: December 16, 2021

1 SARAH WELLMAN, individually and on behalf  
2 of all others similarly situated,

3 Plaintiff,

4 v.

5 FLO HEALTH, INC., GOOGLE, LLC,  
6 FACEBOOK, INC., APPSFLYER, INC., and  
7 FLURRY, INC.,

8 Defendants.

9 JUSTINE PIETRZYK, individually and on  
10 behalf of all others similarly situated,

11 Plaintiff,

12 v.

13 FLO HEALTH, INC., GOOGLE, LLC,  
14 FACEBOOK, INC., APPSFLYER, INC., and  
15 FLURRY, INC.,

16 Defendants.

17 JENNIFER CHEN, individually and on behalf of  
18 all others similarly situated,

19 Plaintiff,

20 v.

21 FLO HEALTH, INC., GOOGLE, LLC,  
22 FACEBOOK, INC., APPSFLYER, INC., and  
23 FLURRY, INC.,

24 Defendants.

TESHA GAMINO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

LEAH RIDGWAY and AUTUMN MEIGS,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

MADELINE KISS, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

1 I, Carol C. Villegas, declare:

2 1. I am an attorney in good standing admitted pro hac vice before the Court for this  
3 action. I am a partner at Labaton Sucharow LLP and together with counsel at Lowey  
4 Dannenberg, P.C. and Spector Roseman & Kodroff, P.C. represent the Plaintiffs as Interim Co-  
5 Lead Counsel in the class action captioned *Frasco et al., v. Flo Health, Inc. et al.*, No. 3:21-cv-  
6 00757-JD.

7 2. Attached hereto as Exhibit A is a true and correct copy of the Federal Trade  
8 Commission Complaint against Flo Health, Inc. for violation of provisions of the Federal Trade  
9 Commission Act.

10 3. Attached hereto as Exhibit B is a true and correct copy of the New York State  
11 Department of Financial Services Report on Investigation of Facebook Inc. Data Privacy  
12 Concerns, dated February 18, 2021.

13  
14 I declare under penalty of perjury that the foregoing is true and correct.  
15 Executed on this 16th day of December 2021.

16 /s/ Carol C. Villegas  
17 Carol C. Villegas  
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